

GRUNGO COLARULO
1926 GREENTREE ROAD, SUITE 110
CHERRY HILL, NEW JERSEY 08003
(856) 528-44994

SPECIAL COUNSEL FOR ANDREW B. FINBERG, CHAPTER 7 TRUSTEE

IN RE:

SUZZAN M. HEISLER,

Debtor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
CHAPTER 7 OF THE BANKRUPTCY CODE
Honorable Jerrold N. Poslusny, Jr., U.S.B.J.

: Case No: 22-17316(JNP)

: **APPLICATION OF SPECIAL
COUNSEL FOR ALLOWANCE OF
FEES AND EXPENSES**

William A. Colarulo, Jr., being duly sworn, hereby certifies as follows:

The Applicant, Grungo Colarulo, ("Applicant"), special counsel for Andrew B. Finberg, Chapter 7 Trustee (the "Trustee") respectfully applies and shows as follows:

1. On September 15, 2022, the Debtor filed a Chapter 7 Bankruptcy Petition.
2. On or about September 16, 2022, Andrew B. Finberg was appointed Chapter 7 Trustee and qualified for and accepted said appointment.
3. Pursuant to an Order entered by the Court dated December 8, 2022, Applicant was retained by the Trustee to represent the Debtor as special counsel in a claim relating to the debtor's involvement in a personal injury matter.
4. The Applicant agreed to be paid solely out of the proceeds of the litigation in accordance with the following provisions:
 - a. the Attorney's out-of-pocket costs shall be reimbursed;
 - b. the Attorney shall be entitled to 33-1/3% on the proceeds remaining after payment of out-of-pocket expenses.

5. After negotiations with defense counsel, a settlement was reached in the amount of \$100,000.00.

6. Pursuant to the terms of its retention by the Trustee, Applicant is requesting that it be allowed the sum of \$33,010.60, representing its Contingency fee per the Retainer Agreement between the Applicant and the Debtor. The Contingency Fee is 33 1/3% of the first \$750,000.00 recovered. Applicant is also requesting the reimbursement of all out-of-pocket expenses in the amount of \$968.19. A breakdown is as follows: Medical Records, \$864.94; Miscellaneous Fees (certified mail), \$13.92; Child Support Judgment Search, \$10.00; Advanced Cost Case Loan Interest (as of February 21, 2023), \$79.33.

WHEREFORE, the undersigned respectfully requests that it be awarded fees in the amount of \$33,010.60 for professional services rendered, as well as reimbursement of out-of-pocket expenses in the amount of \$968.19 for a total award of \$33,978.79

GRUNGO COLARULO

By: /s/ William A. Colarulo, Jr.
William A. Colarulo, Jr.

Dated: June 14, 2023